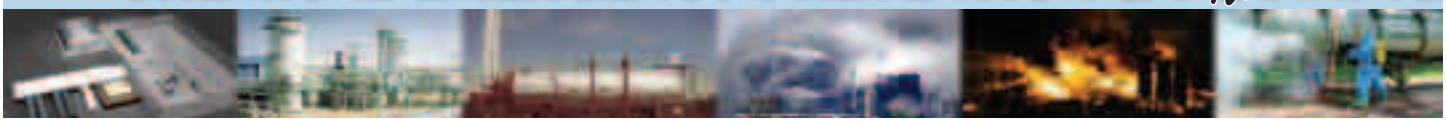
Clean Air Act 112(r) Risk Management Program (RMP) SPCC/FRP EPCRA

CHEMICAL EMERGENCY PREVENTION & PLANNING Newsletter



July - August 2010 US EPA Region 10

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Newsletter

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REPORT
CHEMICAL or OIL SPILLS
to the NATIONAL RESPONSE CENTER
1-800-424-8802

What is "Process Safety"?

(Reprinted from CCPS Process Safety Beacon 2008)

Not all hazards are the same or can cause equal consequences. Personal or occupational safety hazards, such as slips, falls, cuts, and vehicle accidents usually affect one individual worker. On the other hand, process safety hazards may cause major accidents involving the release of potentially dangerous materials, fires and explosions or both. Process safety incidents can have catastrophic effects and can result in multiple injuries and fatalities, as well as substantial economic, property, and environmental damage. Process safety incidents can harm workers inside the plant and members of the public who reside nearby. That is why Process Safety Management focuses on the design and engineering of facilities, hazard assessments, incident investigation, management of change, inspection, testing, and maintenance of equipment, effective process controls and alarms, operating and maintenance procedures, training of personnel, and human factors.

Different activities and programs are required to manage these different safety concerns.

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Measuring Process Safety Performance

So, how can we tell whether or not our process safety management activities are effective? How can we tell if our performance is improving over the years? How do we know how one plant, or unit in a plant, is performing compared to others? How will we decide where to focus our attention so we can get better? If the traditional safety measures are not good for monitoring process safety performance, we need to invent new measures that will.

Many industry organizations, including CCPS, are actively working to develop new ways to measure process safety performance. But these tools cannot be effective unless everybody in the process industry workforce understands what these tools are, and why they are needed. And, most important, we all have to understand what our role will be in using any new process safety measurement tools. We need to understand what types of events we need to report, and how to report them in our organization.

Measurement Tools

- CCPS, working with a number of industrial, labor, and government organizations, has developed tools for measuring process safety performance. The report recommending specific measurement tools was issued in December 2007, and can be found at the CCPS web site, http://www.aiche.org/ccps/.
- Two types of measurements proposed – lagging indicators, which measure actual outcomes and past performance (the number of process safety incidents which have occurred), and leading indicators which measure process safety management activities, and which are believed to be useful in predicting future performance.
- Lagging indicators will measure, for example, the number of releases of hazardous material or energy from plant equipment, fires and explosions, and process related injuries.
- Leading indicators will measure, for example, plant mechanical integrity, action item follow up, management of change, and process safety training.

What can you do?

- Understand what your company is doing to measure process safety performance. Learn and understand the specific measures that your company is using.
- Know what kinds of incidents need to be reported under your company's process safety measurement program.
- Be familiar with how to report process safety incidents in your plant.
- Be diligent in reporting incidents. Remember that a company cannot improve process safety performance if it does not know about incidents that occur in the plant.
- Understand leading indicators of process safety performance for your plant and how to report them.
- Download and read the CCPS report on measuring process safety performance: Leading and Lagging Metrics

What is Process Safety?

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Process Safety vs Personal Safety

- Good personal safety performance does not ensure good process safety performance. While there is much in common, such as a good safety culture and attitude, good process safety performance requires a thorough understanding of the specific hazards associated with the chemicals being handled or stored, and the process operations being carried out in a particular plant.
- Traditional safety measures such as injury rates, lost time accident rates, and days lost from work may not be good indicators of process safety performance.

What Can You Do

- Understand the specific hazards of the materials in your facility and your responsibility in the safe handling of these materials.
- Understand the specific hazards of the manufacturing, storage, transport, repackaging, or other processing operations conducted at your facility.
- Understand your role in process safety activities, including process hazard analysis, management of change, incident reporting and investigation, maintenance and testing, and following safe work practices and procedures.

LIST OF LISTS

Chemical Reporting Resource for EPCRA and RMP

Title III Consolidated List of Lists - May 2010 Version

The Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-to-Know Act (EPCRA) and Section 112(r) of the Clean Air Act (also known as the List of Lists) was prepared to help firms handling chemicals determine whether they need to submit reports under sections 302, 304, or 313 of EPCRA and, for a specific chemical, what reports may need to be submitted. It will also help firms determine whether they will be subject to accident prevention regulations under CAA section 112(r). These lists should be used as a reference tool, not as a definitive source of compliance information. Compliance information for EPCRA is published in the Code of Federal Regulations (CFR), 40 CFR Parts 302, 355, and 372. Compliance information for CAA section 112(r) is published in 40 CFR Part 68. The List of Lists is available in several formats.

The searchable Title III List of Lists database is temporarily unavailable. Use the download links below.

Adobe PDF - Title III Consolidated List of Lists - May 2010 (105 pp, 497KB, About PDF)

Microsoft Excel - Title III Consolidated List of Lists - May 2010 (296KB, XLS)

RMP*eSubmit Training

July 21 Webinar

For those not familiar with RMP*eSubmit, EPA will hold a Webinar during which we will explain how to submit an RMP using the new software. There will be time for questions and answers at the end of the Webinar.

Registration for EPA's RMP*eSubmit Webinar, scheduled for Wednesday, July 21st (1:00 PM to 2:30 PM Eastern Time), is now open. Registration is required for this free Webinar. We have limited lines available, so registration will be on a first come / first serve basis. Register online via http://www.eventbrite.com/event/663963934. Once registered, you will receive a confirmation e-mail with instructions on how to sign into the Webinar.

If you have questions concerning this Webinar, please e-mail Kristine Mikulka (kristine_mikulka@sra.com).

RMP Training: Alaska Final Call

For ALASKA FACILITIES Only

RISK MANAGEMENT PROGRAM (RMP) Training

July 19, 2010

Federal Building, Conference Room 154

222 West 7th Avenue

Anchorage, AK

Additional information can be found on:

EPA Region 10's RMP website

Registration information

Where Do I Go For More Information?

http://www.epa.gov/emergencies/rmp will be updated as new information becomes available.

EPA maintains numerous listservs to keep the public, state and local officials, and industry up to date, including several that pertain to emergency management. You can sign up for our list serve to receive periodic updates: https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer

EPA Region 10 RMP Coordinator: Javier Morales 206-553-1255

EPA Region 10 RMP Website: http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/rmp

Superfund, TRI, EPCRA, RMP & Oil Information Center - The Information Center can also answer questions related to Clean Air Act section 112(r) and RMP reporting requirements.

(800) 424-9346 or TDD (800) 553-7672

(703) 412-9810 or TDD (703) 412-3323 in the Washington, D.C. area

Normal Hours of Operation:

Monday - Thursday 10:00 a.m. - 3:00 p.m. Eastern Time

Extended Hours of Operation (May, June, and July):

Monday - Friday 9:00 a.m. - 5:00 p.m. Eastern Time

Closed Federal Holidays

http://www.epa.gov/superfund/contacts/infocenter/

Risk Management Program (RMP) Reporting Center - The Reporting Center can answer questions about software or installation problems.

The RMP Reporting Center is available from 8:00 a.m. to 4:30 p.m., Monday through Friday, for questions on the Risk Management Plan program.

(703) 227-7650 (phone)

RMPRC@epa.cdx.net (e-mail)

This newsletter provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP and other issues relating to Accidental Release Prevention Requirements. The information should be used as a reference tool, not as a definitive source of compliance information. Compliance regulations are published in 40 CFR Part 68 for CAA section 112(r) Risk Management Program, 40 CFR Part 355/370 for EPCRA, and 40 CFR Part 112.2 for SPCC/FRP.